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Attorneys for Defendants

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SARA KIM NGUYEN, individually,

13 Plaintiff,

14 vs.

15 LANE F. SMITH, M.D., individually; SMITH
16 SALON, LLC dba Chic La Vie, a Limited-
Liability Company; SMITH PLASTIC
17 SURGERY INSTITUTE, PC, a Professional
Corporation; SMITH PLASTIC SURGERY
18 BUILDING LLC, a Limited-Liability Company;
ROE ENTITIES I – V, inclusive,

19 Defendants.
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Case No.: 2:21-cv-00213-KJD-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME FOR
DEFENDANT LANE F. SMITH, M.D.
TO FILE HIS REPLY TO IN
SUPPORT OF MOTION TO SEAL
OR STRIKE
(First Request)**

21 Defendant Lane F. Smith, M.D. (hereinafter “Dr. Smith”) by and through his counsel,
22 Amanda L. Ireland, Esq. and Gabriel L. Grasso, Esq., and Plaintiff, Sarah Kim Nguyen, by and
23 through her counsel of record Andre M. Lagomarsino, Esq. and Cory M. Ford, Esq., do hereby
24 agree and stipulate to an 14-day extension for Dr. Smith to file a Reply in Support of his Motion

1 to Seal Complaint, or in the Alternative, Motion to Strike Scandalous Immaterial Matter (Doc. 9)
2 (“Motion to Seal or Strike”) from March 23, 2021 until April 6, 2021.

3 The Complaint was filed on February 9, 2021, the Motion to Seal or Strike was filed on
4 February 26, 2021, and a hearing on the Motion was set for May 6, 2021 at 10 am.

5 This is Dr. Smith’s first request for an extension of the Motion to Seal or Strike Reply
6 deadline, and is submitted pursuant to Local Rules IA 6-1, 6-2 and II 7-1.

7 The extension is requested based on agreements between counsel and for good cause. The
8 parties previously stipulated to extend the time for Plaintiff to respond to the Motion to Seal or
9 Strike from March 12th until March 22nd. (Doc. 13) The Stipulation was granted on March 15th.
10 (Doc. 14) The next day, March 16th, somewhat unexpectedly for defense counsel, Plaintiff filed
11 her Opposition. (Doc. 15)

12 Counsel for the parties participated in the Rule 26(f) conference on March 22, 2021,
13 during which they agreed an extension for Dr. Smith’s Reply was appropriate as a matter of
14 professional courtesy, as well as consistent with the parties’ interest in attempting informal
15 settlement discussions prior to the hearing on the Motion to Seal or Strike.

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Accordingly, Dr. Smith shall have up to and including April 6, 2021 to file his Reply in support of the Motion to Seal or Strike.

Dated this 22nd day of March 2021.

IRELAND LAW GROUP, LLC

/s/ Amanda L. Ireland

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Attorneys for Defendants

Dated this 22nd day of March 2021.

LAGOMARSINO LAW

/s/ Andre M. Lagomarsino

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Attorneys for Plaintiff

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: March 26, 2021.